

BEFORE THE  
MISSOURI ETHICS COMMISSION

Filed  
OCT 29 2015  
Missouri Ethics  
Commission

MISSOURI ETHICS COMMISSION, )  
)  
Petitioner, )  
)  
v. ) Case No. 14E126, 14E143  
)  
CARRIE MAIDMENT, d/b/a )  
PRINT MEDIA DESIGN )  
)  
Respondent. )

CONSENT ORDER

The parties have filed a Joint Stipulation of Facts, Waiver of Hearing, and Proposed Consent Order with the Missouri Ethics Commission. Accordingly, the Missouri Ethics Commission accepts as true the facts stipulated and finds that Respondent violated Section 130.031.8(4), RSMo.

The Commission directs that the Joint Stipulation be adopted.

1. Respondent shall comply with all relevant sections of Chapter 130, RSMo.
2. It is the order of the Missouri Ethics Commission that a letter be sent to Respondent Maidment reminding her of the requirement to obtain information regarding "paid for by" disclosures for any mailer "relating to" any candidate for public office, pursuant to Section 105.961.4(2), RSMo.

SO ORDERED this 29<sup>th</sup> day of October, 2015

By:



Charles E. Weedman, Jr., Chair  
Missouri Ethics Commission



**MISSOURI ETHICS COMMISSION**

P.O. Box 1254  
Jefferson City, MO 65102  
[www.mec.mo.gov](http://www.mec.mo.gov)  
(573) 751-2020 / (800) 392-8660

James Klahr  
Executive Director

October 29, 2015

Carrie Maidment  
d/b/a Print Media Design  
12508 Northern Avenue  
Liberty MO 64048

RE: MEC Case No. 14E126, 14E143

Dear Ms. Maidment:

A letter is issued to you pursuant to the authority granted to the Missouri Ethics Commission in Section 105.961.4(4), RSMo.

The Commission has accepted the submission of the Joint Stipulation of Facts, Waiver of Hearing Before the Missouri Ethics Commission, and Consent Order With Joint Proposed Findings of Fact and Conclusions of Law in this matter, a copy of which submission is marked as Exhibit A, attached hereto and incorporated herein by reference.

The Commission issues this reminder that under Section 130.031.8, RSMo, Print Media Design is required to obtain "paid for by" disclosure information before accepting for publication or printing or before completing work on any printed material related to a candidate or ballot measure.

Sincerely,

A handwritten signature in cursive script, reading "C. E. Weedman, Jr.", is written over a faint, larger version of the same signature.

Charles E. Weedman, Jr., Chair  
Missouri Ethics Commission

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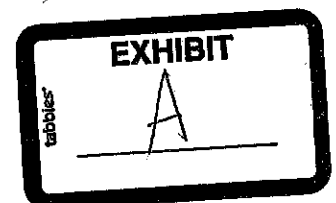
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|-----------------------------|---|-------------------------|
| MISSOURI ETHICS COMMISSION, | ) |                         |
|                             | ) |                         |
| Petitioner,                 | ) |                         |
|                             | ) | Case No. 14E126, 14E143 |
| v.                          | ) |                         |
|                             | ) |                         |
| CARRIE MAIDMENT, d/b/a      | ) |                         |
| PRINT MEDIA DESIGN          | ) |                         |
|                             | ) |                         |
| Respondent.                 | ) |                         |

**JOINT STIPULATION OF FACTS, WAIVER OF HEARING  
BEFORE THE MISSOURI ETHICS COMMISSION, AND  
CONSENT ORDER WITH JOINT PROPOSED  
FINDINGS OF FACT AND CONCLUSIONS OF LAW**

The undersigned parties jointly stipulate to the facts and consent to the action set forth below.

The undersigned Respondent, Maidment, acknowledges that she has received and reviewed a copy of the Complaint filed by the Petitioner in this case, and the parties submit to the jurisdiction of the Missouri Ethics Commission.

The undersigned Respondent further acknowledges that she is aware of the various rights and privileges afforded by law, including but not limited to: the right to appear and be represented by counsel; the right to have all allegations against Respondent be proven upon the record by competent and substantial evidence; the right to cross-examine any witnesses appearing at the hearing against Respondent; the right to present evidence on Respondent's behalf at the hearing; and the right to a decision upon the record of the hearing. Being aware of these rights provided to Respondent by operation of law, the undersigned Respondent knowingly and voluntarily waives each and every one of these rights and freely enters into this Joint Stipulation of Facts, Waiver of Hearing before the Missouri Ethics Commission, and Consent



Order with Joint Proposed Findings of Fact and Conclusions of Law, and agrees to abide by the terms of this document.

**I.**

Based upon the foregoing, the Petitioner and the undersigned Respondent jointly stipulate to the following and request that the Missouri Ethics Commission adopt as its own the Joint Proposed Findings of Fact and the Joint Proposed Conclusions of Law, as follows:

**JOINT PROPOSED FINDINGS OF FACT**

1. The Missouri Ethics Commission is an agency of the State of Missouri established pursuant to Section 105.955, RSMo, in part for the purpose of enforcing the provisions of Chapter 130, RSMo.
2. Breman Anderson was one of ten candidates running for three at-large seats on the Hickman Mills School Board in the April 8, 2014, election.
3. Other at-large candidates included Bonnaye Mims, Dan Osman, and Karry Palmer.
4. Mr. Anderson requested assistance from Clinton Adams, Jr. for a mailer that opposed Mr. Anderson's opponent's for the at-large seat.
5. Mr. Adams worked with Respondent Maidment, through her business Print Media Design, to prepare and circulate two negative mailers opposing Mr. Anderson's opponents, including drafting language, choosing language to use, and picking up the second mailer from Print Media Design.
6. Print Media Design is a business name registered by Respondent Maidment with the Missouri Secretary of State.
7. The first mailer opposed Mims, Osman, and Palmer.

8. The second mailer opposed Mims and Palmer.
9. The mailers were sent between April 3 and April 7, 2014, prior to the April 8 election.
10. Respondent Maidment requested "paid for by" disclosure information for the mailers.
11. Mr. Adams told Respondent Maidment that a "paid for by" disclosure was not required for the mailers.
12. Mr. Adams instructed Respondent Maidment to use the phrase "Citizens United to Protect Our Children" for the first mailer, but did not include an address.
13. The second mailer did not identify "Citizens United to Protect Our Children" or any other organization.
14. "Citizens United to Protect Our Children" is not registered as a committee with the Missouri Ethics Commission, nor is it registered as an entity with the Missouri Secretary of State or any other agency of the State of Missouri.
15. Respondent Maidment prepared invoices made out to "Citizens United to Protect Our Children" for both mailers, and delivered those invoices to Mr. Adams.
16. The invoice for the first mailer included printing and postage, totaling \$1,795.61.
17. The invoice for the second mailer included printing but not postage, totaling \$570.
18. Respondents Anderson and Committee to Elect Breman Anderson issued a check to Print Media Design for \$1,481.74 for the mailers.
19. The remainder of the invoiced amounts have not been paid.

20. Pursuant to Section 105.961, RSMo, the Commission's staff investigated complaints filed with the Commission and reported the investigation findings to the Commission.

21. Based on the report of the Commission's staff, the Commission determined that there were reasonable grounds to believe that violations of law occurred, and it therefore authorized a hearing in this matter pursuant to Section 105.961.3, RSMo.

### **JOINT PROPOSED CONCLUSIONS OF LAW**

22. Any person publishing, circulating, or distributing any printed matter relative to any candidate for public office . . . shall on the face of the printed matter identify in a clear and conspicuous manner the person who paid for the printed matter with the words "Paid for by" followed by the proper identification of the sponsor pursuant to this section." § 130.031.8, RSMo.

23. Printed matter includes "any pamphlet, circular, handbill, sample ballot, advertisement, including advertisements in any newspaper or other periodical, sign, including signs for display on motor vehicles, or other imprinted or lettered material." § 130.031.8, RSMo.

24. "No person shall accept for publication or printing nor shall such work be completed until the printed matter is properly identified as required by this subsection." § 130.031.8(4), RSMo.

25. There is probable cause to believe that Respondent Maidment violated Section 130.031.8(4), RSMo, by accepting for publication or printing and completing two mailers relating to candidates in the April 2014 election without "paid for by" disclosure information.

## II.

Based on the foregoing, the parties hereto mutually agree and stipulate that the following shall constitute the order entered by the Missouri Ethics Commission in this matter. This order will be effective immediately upon the issuance of the Consent Order of the Missouri Ethics Commission without further action by any party:

1. The parties understand that the Petitioner will maintain this Joint Stipulation as an open and public record of the Missouri Ethics Commission.
2. The Commission shall issue its Consent Order in the form attached hereto as Exhibit A.
  - a. Respondent shall comply with all relevant sections of Chapter 130, RSMo.
  - b. It is the Order of the Missouri Ethics Commission that a letter reminding Respondent Maidment of the requirement to obtain information regarding "paid for by" disclosure for any mailer "relating to" any candidate for public office, pursuant to Section 105.961.4(2), RSMo.
3. The parties consent to the entry of record and approval of this Joint Stipulation and to the termination of any further proceedings before the Commission based upon the Complaint filed by the Petitioner in the above action.
4. Respondent, together with her heirs, successors, and assigns, does hereby waive, release, acquit and forever discharge the Missouri Ethics Commission and its attorneys of or from any liability, claim, actions, causes of action, fees, costs and expenses, and compensation, including but not limited to, a claim for attorney's fees whatsoever which Respondent or Respondent's attorney may now have or which they may hereafter have, which are based upon or arise out of the above cases.

5. This joint stipulation does not settle, release, waive, or otherwise relieve Respondent from any late filing fees due to the appropriate filing authority, including Petitioner Missouri Ethics Commission. Respondent understands that late filing fees accrue automatically under Section 105.963, RSMo.

RESPONDENT CARRIE MAIDMENT

By: Carrie R. Maidment 10/19/15  
Carrie Maidment Date

PETITIONER MISSOURI ETHICS  
COMMISSION

By: James Klahr 10/29/15  
James Klahr Date  
Executive Director

By: Curtis R. Stokes Oct. 28, 2015  
Curtis R. Stokes Date  
Attorney for Petitioner